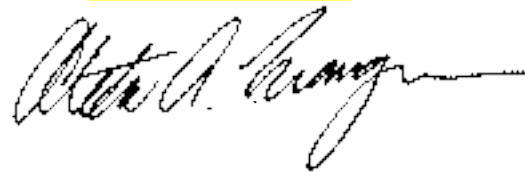


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION



UNITED STATES OF AMERICA

vs.

Case No.: 3:15-cr-00074-1

ANGELA SUDDARTH

**ANGELA SUDDARTH'S SECOND MOTION FOR ISSUANCE OF 17(c) SUBPOENAS
AND INCORPORATED MEMROANDUM OF LAW**
(Michael Bloss)

Defendant, Angela Suddarth, respectfully requests that this Court enter an order directing the issuance of a subpoena duces tecum, pursuant to Rule 17(c), Federal Rules of Criminal Procedure to the duly authorized agents of the following: Michael Bloss, c/o Transportation Continental, Inc. 495 FM2061 Pharr, TX 78577.

The list of documents sought to be produced for each entity is more fully set forth in Exhibit 1 attached hereto, the subpoena duces tecum. The requested documents should be produced on or before November 24, 2015, at a place specified by this Court.

The Supreme Court articulated the test for obtaining production of documents from third parties pretrial under Rule 17(c) in *United States v. Nixon*, 418 U.S. 683 (1974). The moving party must show that: (1) the evidence sought is relevant and evidentiary; (2) the evidence is not otherwise procurable reasonably in advance of trial; (3) the party cannot properly prepare for trial without production and inspection in advance of trial, and that failure to obtain such inspection may unreasonably delay the trial; (4) the application is made in good faith and is not a fishing expedition.